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LETTER AND COMMENTS FROM COMMONWEALTH OF VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY REGARDING DRAFT FINAL ENGINEERING EVALUATION AND
COST ANALYSIS SITE 17 NAS OCEANA VIRGINIA BEACH VA

5/4/1994

COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

Richard N. Burton
Director

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May 4, 1994

Ms. Nina M. Johnson, P. E.
Code 18
Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

RE: Draft Final Engineering Evaluation and Cost Analysis
(EE/CA) at Site 17, Fire Training Ring, NALF Fentress

Dear Ms. Johnson:

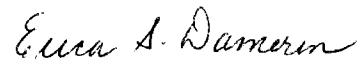
Thank you for providing the Department of Environmental Quality (DEQ), Waste Division, the opportunity to comment on the "Draft Final Engineering Evaluation and Cost Analysis (EE/CA) at Site 17, Fire Training Ring, Naval Axillary Landing Field, Fentress".

Attached are our comments and questions concerning the draft report. Comments on the report from representatives of Waste Division Virginia Beach Regional Office were incorporated in this review. Additionally, responses received from the Chesapeake Bay Local Assistance Department and the Department of Health indicated that the activities proposed did not have any adverse impact on their programs.

NALF Fentress
EE/CA Site 17
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If you have any questions concerning these comments or questions, please contact me at (804) 225-3257.

Sincerely,



Erica S. Dameron
Remedial Project Manager
Federal Facilities Program

Attachment

cc: James Harris, LANTDIV
Robert Stroud, EPA Region III, 3HW61
Milt Johnston, Waste Division Virginia Beach Regional Office
Lora Fly, Waste Division Virginia Beach Regional Office
Amy Webster, Water Division Tidewater Regional Office
K. C. Das, Office of Special Programs Waste Division
Durwood Willis, BRAC

Comments on Draft Final EE/CA
at Site 17, Fire Training Ring
NALF Fentress

General Comments

1. Public Comment Period
 A public notice describing the EE/CA and announcing a public comment period must be published in a major local newspaper. The public notice may be combined with notice of availability of the administrative record file, pursuant to the administrative record requirement in Section 300.820 of the NCP. The EE/CA is part of the administrative record file and is subject to the public comment and comment response requirements for the administrative record. Please send a copy of the public notice or a letter indicating the public comment period when it is implemented.
2. Executive Summary
 The EE/CA should contain an Executive Summary which provides a general overview of the contents of the EE/CA.
3. Site Characterization
 The EE/CA references several documents on page 2-3 of Section 2.0 of the Site Background section. The information for the site should be included in the document and not be included by reference. Information on the type of facility and operational status should be mentioned in this "stand alone" document. The year of operation of the fire training area, materials disposed on-site, estimated quantities of contaminants and potential hazards, regulatory history, should be mentioned to determine operational status. The surrounding land use and populations information including mention of the land use, possible pathways of exposure, identification of sensitive populations, estimate of populations densities within potentially affected radius, description of drinking water sources, National Historic Preservation Act considerations and sensitive ecosystems (wetlands, etc.) should also be included. Again a brief inclusion of this information in the site characterization section would facilitate the identification of ARARs.
4. Determination of Removal Schedule
 The general schedule for removal activities, including both the start and completion time for the non-time critical removal action should be part of the EE/CA. A more detailed schedule for the removal activity should be given either on page 3-2 or in an appendix of the report. The schedule established for a site can be an important decision criterion to evaluate the removal action alternatives based on their

implementation times. So the statement of the contract completion time (page 3-2) " will vary depending on the selected removal alternative " is not sufficient.

5. Identification of Removal Action Alternatives and Detail
Each alternative should be described with enough detail so that the entire treatment process can be understood. It is mentioned in the report that de-watering may be necessary yet the process treatment does not describe a de-watering process. How will the water be treated or disposed? Is it being proposed that de-watering activities of the soil be discharged to the surface water? What is meant that "standing water should be discharged to the surface at a location near the work area, but out of the way of removal activities"? The off-site locations for the treatment and/or disposal facilities should also be noted in the report.

Please note item #3, on the impact to wetlands which is included in Section 4.0, as a general work item common to alternatives 2 through 5. Who will prepare the delineation of and the impact on the wetlands or has this already been done?

A general work item which is common to alternatives 2 through 5 includes post-removal confirmatory sampling and analysis (Page 4-1, #4). The post-removal confirmatory sampling and analysis needs to be describe in greater detail and should include all of the sampling parameters. Discrete samples are preferred to composite samples, especially for the verification of contamination removal. Post-excavation verification analysis indicated only TPH will be tested. Please include your justification for this statement since this area had some indications of chlorinated organic compound contamination which is very common at fire training areas.

On page 4-1, included in other items of work not included is "removal of surface debris within the fire ring, if any". Is there any surface debris in the fire ring or anything in the ring that may contribute to be a source of contamination that should also be removed?

One alternative which was not discussed was the Off-site bioremediation treatment. This viable treatment method was not evaluated. It is currently the preferred alternative at another TPH contaminated site in the Tidewater area. This method can be very cost effective since this material has the potential to be treated at the Navy's Craney Island Bio-remediation Cell.

Specific Comments

6. Section 2.7., Previous Site Investigations

Not all of the sample locations listed in Tables 2-1 through 2-6 were identified; therefore the lateral extent of contamination is not known.

Sample SB-121/122 was listed as "not analyzed" during the December 13, 1991, sampling round; however, the April 28 and 29, 1993, sampling results indicated TPH concentration above 100 ppm. Why is this section to the south of the abandoned fire ring not part of the area to be remediated?

7. Section 2.7.1., Supplemental Site Investigation

Soil samples were collected at a maximum depth of two to four feet below the ground surface (bgs), just above the water table. How will the clean up level of 100 ppm be obtained if excavation is halted at four feet bgs?

8. Section 3.4.1., Site Specific Cleanup Goals for Soils

In this section the draft states "levels have been established by the Commonwealth of Virginia of Waste Management 'Guidelines for the Disposal of Soil Contaminated with Petroleum Products', dated January 5, 1991... at 100 ppm for the cleanup goal for Industrial Soil". The guidelines that were established were for the disposal of soil at sanitary landfills. Soils having a TPH concentration below 50 ppm and a total BTEX of less than 10 ppm may be used as clean fill with specific restriction on locations near bodies of water, wells and special populations.

The presence of concentrations of TPH 100 ppm or greater warrants an assessment of risk. Risk assessment can not be conducted on TPH. This class of compounds must be broken down into its constituents: benzene, toluene, ethylbenzene, and xylene. If you were to use the risk associated with benzene to characterize the worst case scenario for impact to human health at this site, reference to the EPA Region III Risk-Based Concentration (RBC) Table, dated March 18, 1994, shows that the acceptable concentrations of benzene in commercial/industrial soils is 99 ppm; and 22 ppm in residential soils.

A risk assessment of the site should be performed, also and ecological assessment should be preformed. A qualitative, rather than a quantitative, approach has been acceptable in the past for developing an Ecological Risk Assessment, since risk based data is not available for TPH.

Page 3-4, states that removal action will not address groundwater contamination. How will groundwater contamination be addressed?

9. Section 5.4.2., Implementability

On page 5-9, under the administrative feasibility of the alternative selected (Alternative 4; Off-Site Disposal - Landfill), it is stated that "the implementations of this alternative does not require any permits for on-site activities based on exemption granted under CERCLA 121(e)." This statement should be corrected since it is an off-site alternative. If it was an on-site alternative at a site on the NPL the reference for the permit requirement would apply. However, the installation is not on the NPL and Section 120(a)(4) of CERCLA would pertain to on-site activities for installation not on the NPL. Section 120(a)(4) states " State laws concerning removal and remedial action, including State laws regarding enforcement, shall apply to removal and remedial actions a facilities owned or operated by a department, agency or instrumentality of the United States when such facilities are not included on the National Priorities List..." At installations not on the NPL administrative as well as substantive requirements are required by the Commonwealth of Virginia unless a consent order or other federal facilities agreement is in place.